

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UTILITY WORKERS, LOCAL 369,

Plaintiffs,

v.

EXELON NEW ENGLAND POWER
SERVICES INC.,

Defendant.

C.A. No.

04 CV 10293 DPW

MOTION FOR TEMPORARY RESTRAINING ORDER

Now comes the Plaintiff, Local 369, Utility Workers Union of America ("Local 369" or "the Union") and moves this Court to issue a Temporary Restraining Order in accordance with the Prayer for Relief in the Plaintiff's Verified Complaint. Specifically plaintiff requests an order restraining Exelon New England Power Services Inc. ("Exelon Service Company") from implementing a reduction in force below the staffing levels necessary to safely operate the plant pending arbitration of the Union's grievances.

Plaintiff makes this Motion on the grounds alleged in the Verified Complaint filed herein, and for the reason that immediate and irreparable injury, loss and damage will result to Plaintiff and to the collective bargaining process if relief is denied. A Memorandum in Support of this Motion is submitted herewith.

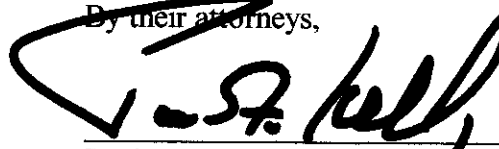
WHEREFORE, plaintiff Local 369 respectfully requests that an order enter restraining Exelon Service Company from reducing its Mystic 4-7 workforce below the level necessary to safely operate the plant pending arbitration of the union grievances.

REQUEST FOR ORAL ARGUMENT

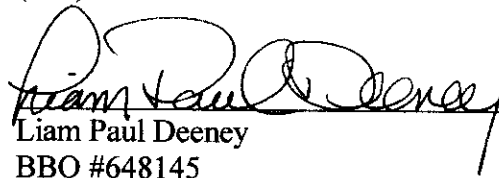
Pursuant to L.R. 7.1(d), Plaintiff requests oral argument on this Motion.

Respectfully submitted,

Respectfully submitted,
UTILITY WORKERS, LOCAL 369
By their attorneys,

A large, stylized handwritten signature in black ink, appearing to read "P. F. Kelly".

Paul F. Kelly, Esquire
BBO #267000
SEGAL, ROITMAN & COLEMAN
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(617) 742-0208

A handwritten signature in black ink, appearing to read "Liam Paul Deeney".

Liam Paul Deeney
BBO #648145
Utility Workers' Union of America
Local 369
120 Bay State Drive
Braintree, MA 02184

Dated: February 12, 2004